



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

February 26, 2018

Mr. William Currie
International Pest Management Institute
P.O. Box 607
Ash Fork, AZ 86320

Subject: Agency Initiated Action – correct Active Ingredient Statement
Product Name: Perma- Guard Garden Household Insecticide D-20
EPA Registration Number: 67197-2

Dear Mr. Currie:

Upon review of the product record, it has come to the Agency's attention that the following changes should be made to the product label:

- 1) The active ingredient statement on the label and Confidential Statement of Formula (CSF) must be corrected. It should include all elements that are included in the formulation. These might include: silicon dioxide from diatomaceous earth, other oxides or moisture. These ingredients MUST sum to 100%. You must express ALL elements that are in the product.
- 2) A corrected Confidential Statement of Formula MUST also be included in your submission expressing the entire composition of the formulation.
- 3) In addition, list all alternate brand names that you have requested by notification from the Agency on the Master Label.

Please submit a revised label and Confidential Statement of Formula(s) within 90 days of the date of this letter as an amendment. In addition, you should send an electronic label to deluise.linda@epa.gov. If you have any questions, please contact Linda A. DeLuise by phone at 703.305.5428, or via email at deluise.linda@epa.gov.